

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-353 (LJL)

No. 24-cv-6563 (LJL)

**DECLARATION OF M. ANNIE HOUGHTON-LARSEN IN SUPPORT OF  
PLAINTIFFS' MOTION TO COMPEL THIRD PARTIES MARIA RYAN AND  
THEODORE GOODMAN TO PRODUCE DOCUMENTS RESPONSIVE TO  
PLAINTIFFS' SUBPOENAS**

I, M. Annie Houghton-Larsen, an attorney admitted to practice in this court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned actions.

2. I submit this declaration in support of Plaintiffs' Letter-Motion to compel third parties Dr. Maria Ryan and Mr. Theodore Goodman to produce documents in response to Plaintiffs' Subpoenas served under Federal Rule of Civil Procedure 45 (the "Ryan Subpoena," the "Goodman Subpoena," and together the "Subpoenas").

3. On November 14, 2024, a copy of the Ryan Subpoena was sent via email to Dr. Ryan. A true and correct copy of Plaintiffs' email sending the Ryan Subpoena to Dr. Ryan is attached hereto as **Exhibit 1**. A true and correct copy of the Ryan Subpoena is attached hereto as **Exhibit 2**. As of the time of this filing, Dr. Ryan has not responded to this email.

4. On November 14, 2024, a copy of the Goodman Subpoena was sent via email to Mr. Goodman. A true and correct copy of Plaintiffs' email sending the Goodman Subpoena to Mr. Goodman is attached hereto as **Exhibit 3**. A true and correct copy of the Goodman Subpoena is attached hereto as **Exhibit 4**.

5. On November 15, 2024, Mr. Goodman replied to Plaintiffs' email with the Goodman Subpoena on him. A true and correct copy of Mr. Goodman's reply email is attached hereto as **Exhibit 5**.

6. On November 18, 2024, Plaintiffs served Dr. Ryan with the Ryan Subpoena by personal service at her New Hampshire residence by leaving a copy with her husband. A true and correct copy of the affidavit of service for the Ryan Subpoena is attached hereto as **Exhibit 6**.

7. On November 18, 2024, Plaintiffs served Mr. Goodman with the Goodman Subpoena by personal service in Palm Beach, Florida. A true and correct copy of the affidavit of service for the Goodman Subpoena is attached hereto as **Exhibit 7**.

8. As of the date of this filing, neither Dr. Ryan nor Mr. Goodman have responded to the Subpoenas.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 6, 2024.

s/ M. Annie Houghton-Larsen  
M. Annie Houghton-Larsen  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, NY 10019  
(212) 728-8000  
mhoughton-larsen@willkie.com

*Attorney for Ruby Freeman and  
Wandrea' Moss*